

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

# UNITED STATES OF AMERICA

Plaintiff,

-VS-

Criminal Action No.  
22-00048-25-CR-W-DGK

TONEISHA R. BLACKMON,

Defendant.

**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

The following matters were discussed and action taken during the pretrial conference:

**PENDING CHARGES: Count 1:** Conspiracy to distribute 5 kilograms or more of cocaine; fentanyl; and less than 50 kilograms of marijuana *in violation of* 21 U.S.C. § 841(a)(1), (b)(1)(C) and (b)(1)(D)

Counts 52, 54: Use of a Communication Facility to Facilitate a Drug Trafficking Crime *in violation of* 21 U.S.C. § 843(b) and (d)(1)

### Forfeiture Allegation One

## TRIAL COUNSEL:

Government: Matthew Moeder, Sean Foley, Stephanie Bradshaw; Paralegal Michelle Wells

Case Agent: ATF Special Agent Elizabeth White

Defense: David A. Kelly

#### **OUTSTANDING MOTIONS:** None

**ANTICIPATED MOTIONS:** Government - Rule 404(b) Notice; Defense - None

## TRIAL WITNESSES:

Government: 50 without stipulations if four defendants go to trial; premature to address stipulations specific to each defendant.

## TRIAL EXHIBITS:

Government: 300 exhibits with four defendants going to trial

Defense: 1-10 exhibits

**DEFENSES:**

- (x) defense of general denial  
( ) defenses of general denial and \_\_\_\_\_
- 

**POSSIBLE DISPOSITION:**

- ( ) Definitely for trial                            (x) Possibly for trial  
( ) Motion to continue to be filed                ( ) Possible a plea will be worked out

**TRIAL TIME: 10 days for trial with four defendants**

Government's case including jury selection: 7-8 days  
Defense case: .5 day

**STIPULATIONS:**

- ( ) not likely  
( ) not appropriate  
(x) likely as to:  
    ( ) chain of custody  
    (x) chemist's reports  
    ( ) prior felony conviction  
    ( ) interstate nexus of firearm  
    ( ) other: foundational issues

**UNUSUAL QUESTIONS OF LAW:** None**FILING DEADLINES:****Witness and Exhibit Lists:**

Government: On or before June 24, 2024

Defense: On or before June 24, 2024

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions:** On or before June 24, 2024

**Jury instructions must comply with Local Rule 51.1**

**Motions in Limine:** On or before June 24, 2024

**TRIAL SETTING:** Criminal jury trial docket commencing 7/8/2024

**Please note:** The Government requests trial start on the second week of the docket as Government Counsel has a conflict on July 8<sup>th</sup> and 9<sup>th</sup>. However, Government Counsel would be available beginning July 10<sup>th</sup>.

**OTHER:**

- ( ) A \_\_\_\_\_-speaking interpreter is required.  
( ) Other assistive devices:

**IT IS SO ORDERED.**

*/s/ Jill A. Morris*  
JILL A. MORRIS  
United States Magistrate Judge